

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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NATIONAL RAILROAD PASSENGER  
CORPORATION,

Plaintiff,

v.

ARCH SPECIALTY INSURANCE COMPANY;  
ASPEN SPECIALTY INSURANCE COMPANY;  
COMMONWEALTH INSURANCE COMPANY;  
FEDERAL INSURANCE COMPANY; LEXINGTON  
INSURANCE COMPANY; LIBERTY MUTUAL FIRE  
INSURANCE COMPANY; CERTAIN  
UNDERWRITERS AT LLOYD'S OF LONDON and  
CERTAIN LONDON MARKET COMPANIES  
Subscribing to Policy Nos. 507/N11NA08240,  
507/N11NA08241, 507/N11NA08242,  
507/N11NA08244, 507/N11NA08244,  
507/N11NA08245 and GEP 2944; MAIDEN  
SPECIALTY INSURANCE COMPANY; MAXUM  
INDEMNITY COMPANY; NAVIGATORS  
INSURANCE COMPANY; PARTNER  
REINSURANCE EUROPE plc; RSUI INDEMNITY  
COMPANY; STEADFAST INSURANCE COMPANY;  
TORUS SPECIALTY INSURANCE COMPANY; and  
WESTPORT INSURANCE CORPORATION,

Defendants.  
-----X

No. 14 Civ. 7510 (JSR)

**PARTNER RE'S NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Partner Re's Rule 56.1 Statement of Undisputed Facts, the accompanying declaration of Catherine Mondell, the accompanying memorandum of law, and upon all pleadings and proceedings heretofore had herein, Partner Re will move this Court, before the Honorable Jed. S. Rakoff, United States Courthouse for the Southern District of New York, Room 14-B, 500 Pearl Street, New York, New York 10007, for

an order granting summary judgment in favor of Partner Re dismissing with prejudice all claims asserted against Partner Re in connection with this action.

PLEASE TAKE FURTHER NOTICE that the schedule for briefing on this motion was set by the Court as reflected in its Order of February 5, 2014 [Docket #150]:

Moving Papers: February 20, 2015

Answering Papers: March 6, 2015

Reply Papers: March 13, 2015

No oral argument has been scheduled.

Dated: New York, New York  
February 20, 2015

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